



OEPA  
SEDO

CLOW WATER SYSTEMS COMPANY

**JEFF OTTERSTEDT**  
Vice President and General Manager

2006 APR 21 AM 11:40

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April 13, 2006

Zach Hamlin  
Division of Air Pollution Control  
Ohio Environmental Protection Agency Southeast District Office  
2195 Front Street  
Logan, Ohio 43138-9031

Reference: 1<sup>st</sup> Quarter 2006 – Deviation Report

Dear Mr. Hamlin:

Enclosed is the 1<sup>st</sup> quarter report. As requested, Clow is including the below verbiage from the General Terms and Conditions in the Title V Permit. "Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete."

Sincerely,

Jeff S. Otterstedt  
Vice President and General Manager

## 1<sup>st</sup> Quarter 2006 Report

I have reviewed the 1st quarter records on the following emission units and have found the following:

Unit	Parameters	Findings
F002	Visible emissions	No deviations
F022	VOC limits Visible emissions	No deviations No deviations
F014	VOC limits Visible emissions	No deviations No deviations
K002	Non-compliant coatings Filtration system	None used No deviations
K005	Non-compliant coatings	None used
K006	Non-compliant coatings Filtration system	None used No deviations
K007	Non-compliant coatings	None used
K008	Non-compliant coatings	None used
K009	Non-compliant coatings VOC limits	None used No deviations
P033	Non-compliant fuels	None used
P901	1) Exhaust gases burned at 1300°F min. 2) Minimum 35" H <sub>2</sub> O DP across venturi	See attached See attached

## Emission Unit P901 – Cupola

### Afterburner Temperature < 1300 F

Date	Duration (minutes)	Cause	Conclusion
1/3/06	20	Unknown	Restarted
1/4/06	16	Emission fan bearings need replaced	Replaced bearings
1/10/06	8	Full Ladle	Restarted
1/26/06	6	Full Ladle	Restarted
1/27/06	13	Unknown	Restarted
1/30/06	18	Unknown	Restarted
1/31/06	6	Unknown	Restarted
2/6/06	2	Unknown	Restarted
2/7/06	5	Unknown	Restarted
2/14/06	6	PPL spout plugged had to shut down	Rammed out spout and restarted
2/20/06	15	Unknown	Restarted
3/3/06	1	Full Ladle	Restarted
3/8/06	2	Unknown	Restarted
3/22/06	3	Low coke bed	Restarted
3/23/06	4	Shut down for full ladle	Restarted
3/29/06	4	Cable on charger	Fixed cable and restarted
3/31/06	1	Unknown	Restarted

1/3/06 - Faulty thermocouple/incorrect temperature reading 00:46 – 00:52

1/17/06 – Missing data 05:22 – 05:27.

3/24/06 – Missing data 10:36 – 10:37.

**Delta Pressure < 35 inches and > 60**

Date	Duration (minutes)	Cause	Conclusion
1/2/06	30	Unknown	Stabilized system
1/11/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
1/15/06	60	Unknown	Stabilized system
1/26/05	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
1/31/06	60	Unknown	Stabilized system
2/2/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/3/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/6/06	60	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/6/05	30	Unknown	Stabilized system
2/7/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/14/06	60	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/15/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
2/16/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
3/3/06	30	High air flow	>60 (62) inches of water, should equate to better control of particulate.
3/23/06	60	Unknown	Stabilized system

2/9/06 – Loose P2 line – fixed line 30 min